

# Rapaport Law Firm

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## MEMORANDUM ENDORSED

March 23, 2023

### Via ECF

Honorable Gabriel W. Gorenstein  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *Trinidad et al. v. 62 Realty, LLC et al.***  
**Case No. 1:22-cv-101 (JLR) (GWG)**

Dear Judge Gorenstein:

We represent Plaintiffs in the above-referenced matter, which involves wage claims under the Fair Labor Standards Act and New York Labor Law. Tomorrow is the deadline for Plaintiffs' counsel to submit our attorneys' fees application. Although the parties have engaged in negotiations, we have not reached an amicable resolution. With Defendants' consent, Plaintiffs request a one-week extension (i.e., to March 31, 2023) of the deadline for our fees application. No other deadlines or scheduled appearances will be affected by the requested extension.

The parties appreciate the Court's attention to this request.

Respectfully,



Marc A. Rapaport

cc: By ECF:  
Alan Smikun, Esq.  
Emanuel Kataev, Esq.

Extension to March 31, 2023, granted.

So Ordered.



GABRIEL W. GORENSTEIN  
United States Magistrate Judge

March 24, 2023